



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VIII, MONTANA OFFICE  
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096  
HELENA, MONTANA 59626-0096

LO  
970307

Ref: 8MO

September 23, 1997

Thomas J. Clifford, Supervisor  
Helena National Forest  
2880 Skyway Drive  
Helena, MT 59601

and

Larry E. Hamilton, Director  
Montana State Office  
USDI, Bureau of Land Management  
222 North 32nd Street  
P.O. Box 36800  
Billings, MT 59107-6800

Re: Helena NF Oil & Gas Leasing  
Draft Supplemental EIS

Dear Mr. Clifford and Mr. Hamilton:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) reviewed the above-referenced Draft Supplemental Environmental Impact Statement (DSEIS).

The Helena National Forest and Bureau of Land Management have prepared a draft supplemental EIS for leasing of lands for oil and gas exploration and development in the Helena National Forest and the Elkhorn Mountains portion of the Deerlodge National Forest. This DSEIS provides additional information and analysis regarding potential cumulative effects of possible oil and gas activities with other reasonably foreseeable activities, and proposes minor modifications to the preferred alternative identified in the Forest Service's April 1996 Record of Decision (ROD), which was withdrawn in July 1996.

Proposed modifications to the preferred alternative include making municipal watersheds for the cities of Helena (Ten Mile Creek drainage) and East Helena (McClellan Creek drainage) unavailable for lease, and extending the No Surface Occupancy (NSO) stipulation to the Black Mountain area and Black Hall Meadows. Two options for the Elkhorn Mountains are presented; 1) lease with the stipulations specified in Alternative 7 of the FEIS; and 2) to make the Elkhorn Mountains unavailable for lease.



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The EPA is pleased to see the improved cumulative impacts analysis, and the proposal to modify the preferred alternative to increase protection to the Helena and East Helena municipal watersheds by making them unavailable for lease. We also support the extension of the NSO stipulation to the Black Mountain area and Black Hall Meadows, and the option of making the Elkhorn Wildlife Management Area unavailable for lease. We commend the Forest Service for being responsive to public concerns to ensure protection of environmental resources.

Based on the procedures EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action and alternatives in an EIS, the Draft Supplemental EIS for Oil and Gas Leasing on the Helena National Forest and Elkhorn Mountains portion of the Deerlodge National Forest has been rated as Category LO (Lack of Objections). A copy of EPA's rating criteria is attached.

The EPA appreciates the opportunity to review and comment on the DSEIS. If we may provide further explanation of our concerns please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232. Thank you for your consideration.

Sincerely,

*Robert L. Fox*  
John F. Wardell  
Director  
Montana Office

Enclosure

cc: Cindy Cody/Virginia Rose, EPA, Denver, 8EPR-EP  
Leslie Vaculic, USFS R-1 LM, Missoula

